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11 | Attorneys for Plaintiffs,

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IO GROUP, INC., a California corporation,
CHANNEL ONE RELEASING, Inc., a
California corporation and LIBERTY
MEDIA HOLDINGS, LLC., a California
corporation,

Plaintiffs,

21 VS.

GLBT, Ltd., a British limited company,
MASH and NEW, Ltd., a British limited
company, PORT 80, Ltd., a company of
unknown origin or structure, STEVEN
JOHN COMPTON, an individual living in
the United Kingdom, and DAVID
GRAHAM COMPTON, an individual
living in the United Kingdom.

27 Defendants.

)
) **CASE NO.: C-10-1282 (MMC)**
)
) **DECLARATION OF D. GILL SPERLEIN IN**
) **SUPPORT OF AWARD OF FEES**
) **RELATING TO PLAINTIFFS MOTION FOR**
) **TERMINATING SANCTIONS**

1 I, D. Gill Sperlein, declare under penalty of perjury that:

2 1. I am over the age of 18 and am a resident of the State of California.

3 2. I have personal knowledge of the facts herein, and if called as a witness, could
4 testify competently thereto.

5 3. I represent Plaintiffs Io Group, Inc. and Channel One Releasing, Inc.

6 4. I have built a reputation and career on my specific experiences relating to litigation
7 involving copyright infringement via the Internet and have specific qualifications relating to such
8 litigation.
9

10 5. I graduated *summa cum laude* from American University, Washington School of
11 Law in 1994.
12

13 6. For the last two years, I have practiced as a sole practitioner. For the eight years
14 prior to that, I served as in house counsel to Io Group, Inc. concentrating on copyright
15 enforcement litigation. Prior to that I worked in a number of different litigation law firms.
16

17 7. My hourly billing rate is \$335.00, which is a reasonable rate for an attorney of my
18 experience and caliber.

19 8. I spent 32 hours working with the items relating to the Motion for Spoliation and
20 Terminating sanctions as set forth in detail below.

21 9. Accordingly, my fees for this time would come to \$10,720.

22 Pursuant to the laws of the United States, I declare under penalty of perjury the foregoing
23 is true and correct.
24

25 Dated: September 29, 2011

/s/ D. Gill Sperlein

26
27 D. GILL SPERLEIN
THE LAW OFFICE OF D. GILL SPERLEIN
Attorneys for Plaintiffs
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1	Date	Plaintiff's Motion for Terminating Sanctions	Hours
2	7/3/2011	Prepare brief for terminating sanctions.	2
3	7/4/2011	Prepare brief for terminating sanctions.	3.9
4	7/5/2011	Complete motion for terminating sanctions and prep for filing.	4.1
5	7/25/2011	Prepare reply to Opposition re Motion for Sanctions.	6.3
6	7/26/2011	Prepare reply to Opposition re Motion for Sanctions.	5.4
7	7/27/2011	Prepare Reply to Opposition re Motion for Sanctions and file.	9.3
8	9/21/2011	Confer with M. Randazza in preparation for motion hearing.	0.6
9	9/22/2011	Prepare for, travel to and attend Motion for Terminating Sanctions.	0.4
10		TOTAL	32